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November 30, 2011

Magistrate Judge Arthur J. Boylan
U.S. District Court
District of Minnesota
300 South Fourth Street, #9E
Minneapolis, MN 55415

**Re: Minneapolis Firefighters' Relief Association, et al. v. Medtronic, Inc., et al.
C. A. No. 0:08-cv-06324-PAM-AJB
Agreed Motion for Extension of Time to File Response to Motion to Compel [No. 259)**

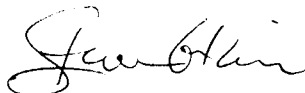
Dear Judge Boylan:

We, together with Boston lawyers Maria Durant and William Kettlewell from Collora LLP, represent the man identified as Confidential Witness No. 2 in plaintiff's complaint. He is the subject of a motion to compel scheduled for hearing on December 8. The motion papers were served on Boston counsel the Wednesday afternoon before Thanksgiving and present important issues concerning the witness's Fifth Amendment right against self-incrimination.

The response to the motion is due tomorrow, Thursday, December 1; and although counsel has been diligently working to timely respond, because of the Thanksgiving holidays and the importance of the issues, it appears that we need a brief extension of the deadline within which to file responsive papers. So, we request the Court to extend the deadline to December 5, 2011. We have spoken to Karl Cambronne, one of the attorneys for the plaintiffs who have brought the motion to compel and to Amy Sterner of Dorsey, one of the attorneys representing defendants, and they have no objection to the extension.

If necessary, Mr. Cambronne and I are available to speak to the Court at any time today.

Sincerely yours,



Steve Gaskins

SWG/jt

cc: Maria R. Durant, Esq./William H. Kettlewell, Esq.